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Attorney for Herberth Morales-Saso

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE IRMA E. GONZALEZ)

UNITED STATES OF AMERICA,) Case: 08cr1808-IEG
Plaintiff,) Date: August 11, 2008
v.) Time: 2 p.m.
HERBERTH MORALES-SOSA,) MOTIONS TO:
Defendant.) (1) COMPEL DISCOVERY/PRESERVE
) EVIDENCE;
) (2) GRANT LEAVE TO FILE FURTHER
) MOTIONS

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, and
DALE BLANKENSHIP, ASSISTANT UNITED STATES ATTORNEY

MOTIONS

Defendant, HERBERTH MORALES-SASO, by and through his attorneys, Robert C. Schlein, asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

- (1) Compel Discovery;
- (2) Grant Leave to File Further Motions.

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These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: July 18, 2008

/s/ROBERT C. SCHLEIN
Robert C. Schlein
Attorney-at-Law
Attorneys for Defendant MORALES-SASO
robert@rcslaw.org